

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE:	§
	§ Chapter 11
FRANCHISE GROUP, INC. <i>et al.</i> , <sup>1</sup>	§
	§ Case No. 24-12480 (JTD)
Debtors.	§
	§ (Jointly Administered)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Christopher M. Winter and James C. Carignan of the law firm Duane Morris LLP hereby appear in the above-referenced jointly administered chapter 11 cases as counsel for Ahuja Development LLC, and, pursuant to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), including Bankruptcy Rules 2002, 3017, 9007 and 9010, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), including Local Rules 2002-1, 3017-1 and 9006-1, request that copies of all notices and pleadings given or filed in these cases be given and served upon counsel as follows:

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases or the rights of Ahuja Development LLC

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed, to be a waiver of any of the rights of Ahuja Development LLC, including, without limitation (i) the right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Ahuja Development LLC is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved. This Notice of Appearance is also not intended, and shall not be deemed or construed, to be a consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or the Federal Rules of Civil Procedure.

Dated: December 9, 2024  
Wilmington, Delaware

Respectfully submitted,

/s/ Christopher M. Winter

Christopher M. Winter (DE 4163)

James C. Carignan (DE 4230)

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**CERTIFICATE OF SERVICE**

I, Christopher M. Winter, hereby certify that on December 9, 2024, I caused a copy of the foregoing NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS to be served on all parties who are scheduled to receive notice through the Court's ECF system.

/s/ Christopher M. Winter

Christopher M. Winter (DE 4163)